

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**JEFFREY W. YOUNG, JR.  
ALEXANDER ALPEROVICH, M.D., and  
ANDREW RUDIN, M.D.**

**Defendants.**

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)  
) **Cr. No.:** 1:19-cr-10040-JDB  
)

) **21 U.S.C. § 846**  
) **21 U.S.C. § 841(a)(1)**  
) **21 U.S.C. § 861(f)**  
) **21 U.S.C. § 856(a)(1)**  
) **18 U.S.C. § 2**  
)

) **FILED UNDER SEAL**  
)  
)

**NOTICE OF PENALTIES**

**COUNT ONE**

**Conspiracy to Distribute and Dispense Controlled Substances  
(21 U.S.C. § 846)**

[A term of imprisonment for not more than twenty years, a fine of up to \$1,000,000, or both, and at least three years supervised release, and a mandatory special assessment of \$100, see 18 U.S.C. § 3013(a).]

**COUNTS TWO THROUGH SEVEN**

**Unlawfully Distributing and Dispensing Controlled Substances to a Pregnant  
Woman and Aiding and Abetting  
(21 U.S.C. §§ 841(a)(1), § 861(f) and 18 U.S.C. § 2)**

[For a first offense: a term of imprisonment for twice the maximum punishment otherwise authorized, or 40 years, a fine of up to \$1,000,000, and at least twice any term of supervised release, or at least six years supervised release, and a mandatory special assessment of \$100, see 18 U.S.C. § 3013(a); except to the extent a greater minimum sentence is otherwise provided, a term of imprisonment under this section shall not be less than one year; in any case of any sentence imposed under this section, imposition or execution of such sentence shall not be suspended and probation shall not be granted; an individual convicted of an offense for which a mandatory minimum term of imprisonment is applicable, shall not be eligible for parole until the individual has served the mandatory term of imprisonment as enhanced in this section.]

[ For any subsequent offenses: any person who violates this section after a prior conviction under this section has become final, a term of imprisonment up to three times the maximum punishment otherwise authorized, or 60 years, a fine of up to \$1,000,000, and at least three times any term of supervised release otherwise authorized for a first offense, or 18 years, and a mandatory special assessment of \$100, see 18 U.S.C. § 3013(a); except to the extent a greater minimum sentence is otherwise provided, a term of imprisonment under this section shall not be less than one year; in any case of any sentence imposed under this section, imposition or execution of such sentence shall not be suspended and probation shall not be granted; an individual convicted of an offense for which a mandatory minimum term of imprisonment is applicable, shall not be eligible for parole until the individual has served the mandatory term of imprisonment as enhanced in this section.]

**COUNTS EIGHT THROUGH FOURTEEN**

**Unlawfully Distributing and Dispensing Controlled Substances and Aiding and Abetting  
(21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2)**

[A term of imprisonment for not more than twenty years, a fine of up to \$1,000,000, or both, and at least three years supervised release, and a mandatory special assessment of \$100, see 18 U.S.C. § 3013(a).]

**COUNT FIFTEEN**

**Maintaining a Drug-Involved Premises and  
Aiding and Abetting  
(21 U.S.C. § 856(a)(1) & 18 U.S.C. § 2)**

[A term of imprisonment for not more than twenty years, a fine of up to \$500,000, or both, and at least three years supervised release, and a mandatory special assessment of \$100, see 18 U.S.C. § 3013(a).]